

Beyond the Cookie

Examining the intersection of data privacy and digital marketing

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1 Introduction

Throughout history, advertising has helped make different media content affordable and accessible. It has adapted to different media forms and user behaviors. Now that the internet has transformed every aspect of our lives, more than 4.5 billion people are online, and various advertising forms shape the economic foundation of the free and open Internet we enjoy today. Given the current debates and increasing regulatory pressure on digital marketing, personalized online advertising, and subscription models, also known as pay-or-okay models, it is important to highlight the economic importance of digital marketing, the need to finance digital content and services, and to proactively address the ongoing debate on the monetization of personal data.

This paper will discuss the current and future state of the online advertising ecosystem, look at established business models, and address often debated topics like contextual versus personalized advertising. It will also touch on the technological and legal foundations in light of innovation and the rapid technological changes that maintain the internet as we know it today and ensure a good user experience. Our goal is to provide policymakers and authorities with a balanced perspective on how online advertising can continue to evolve responsibly to meet the needs of both consumers and businesses in an ever-changing digital landscape, while also prioritizing privacy concerns.

The ad-supported business model enables businesses worldwide to connect with customers and foster growth. Equally significant, yet often overlooked, is its role in providing widespread access to an abundance of free communication, content, and services. In doing so, this model facilitates exercise of various fundamental rights and freedoms, including freedom of expression, access to information, reunion, conducting business, and education. Understanding this connection is of utmost importance. For example, when it comes to accessing news content, people turn to online sources more than TV, print, or radio. In fact, at a time when a global pandemic made having timely and accurate information more important than ever, a ↗ 2021 survey of 92,000 news consumers from 46 countries found that 82 percent got their news from online sources. Beyond news, people rely on online sources even more today. Another ↗ survey – conducted by Nielsen for the World Economic Forum in 2020 – found that 96 percent of people with internet access globally read, watch, or listen to news and entertainment online. It is not only about news and entertainment. Online services supported by personalized ads have facilitated access to education resources, communication through instant messaging or video conferences, VTC transportation, GPS navigation, they have made it easier to book trips, and to find support communities in particular for vulnerable groups – with little to no costs associated. Personalized advertising is therefore an integral part of the digital landscape and makes a significant contribution to maintaining a diverse internet that is accessible to all. A complete ban on personalized advertising would require alternative sources of funding to ensure equal access to information, content, and services. This could negatively impact individual consumers and limit broader access to media, news, and social networks, which currently rely on personalized advertising for financing. Consequently, such a ban could have significant implications for media plurality, freedom of

speech and the right of reunion, which are essential pillars of our democracy. Therefore, the importance of advertising on the internet is undisputed.

At the societal level, online advertising plays a significant macroeconomic role. The ⁷ Bitkom study on the value-added contribution of digital marketing has shown that the resulting induced and extended effects multiply the impact of digital marketing on economic growth in Germany. The digital marketing ecosystem generated revenue of over 25 billion euros in 2022. Nearly 250,000 employees in the field of digital marketing, measured in full-time equivalents (FTE), constitute a crucial source of employment. Over half of the direct employment effects stem from advertisers. The associated income effects comprised a salary sum surpassing 12 billion euros, while the resulting tax and contribution burden reached nearly 6 billion euros. Beneath these macroeconomic statistics lies a diverse and intricate ecosystem comprising numerous stakeholders from various industries, formats, technological innovations, and creative solutions that provide benefits to customers, companies, and society as a whole.

Considering the multitude of stakeholders involved, some of our members report that nearly half of their annual gross merchandise value is attributed to advertising through personalized ads. If these ads become less effective or targeting is no longer feasible, advertisers risk losing revenues. However, the question of the legality of the underlying data processing has been discussed on European and national level for years. European legislators have intentionally chosen to regulate rather than prohibit this business model, recognizing its positive ⁷ impact on the EU economy and the underlying balance of interests. Measures such as data use restrictions, aggregation, and transparency have been implemented to address identified risks and concerns. Key regulations in this regard include the DSA, the Political Ads Regulation, the DMA, the Data Governance Act, the AI Act, as well as the Digital Content Directive 2019/770 and the Consumer Rights Omnibus Directive 2019/2161. While the positive economic and social impacts of personalized online advertising are widely acknowledged, there is also a growing regulatory pressure on internet-based advertising, posing challenges for advertisers striving to ensure compliance. A notable example is the complex regulatory landscape surrounding cookies (see below under 4).

In tandem with regulatory advancements, all stakeholders within this ecosystem have been diligently refining the business models over the years. Their goal is to effectively target future audience segments while prioritizing the users' informational self-determination and privacy. Notably, privacy-enhancing technologies (PETs) deserve special mention in this context. These tools take data protection and especially privacy-by-default and privacy-by-design into account during development. Unlike legacy advertising methods reliant on extensive personal data collection, PETs employ code and computation to safeguard user privacy. This transition carries significant implications for user control, the regulatory environment, and the future of personalized advertising.

This evolution of privacy-enhancing technologies isn't solely driven by compliance; it's also a catalyst for innovation. Advertisers, service providers and publishers stand to benefit significantly from the adoption of PETs, paving the way for a more sustainable and user-centric advertising ecosystem. This adoption will spur the emergence of new and innovative marketing models, supplanting undesirable practices such as fingerprinting with transparent and ethical alternatives.

Users must have transparency and control. Current consent processes, mainly centered around tracking methods like third-party cookies, often result in a frustrating and opaque user experience. PETs offer a potential solution by shifting away from consent-focused models, empowering users with enhanced privacy while unlocking fresh possibilities for the advertising ecosystem. This is crucial to maintain an open and accessible internet for all users. PET-enabled secure technology environments may necessitate a revised regulatory approach, potentially allowing new legal considerations. Privacy-by-design could streamline user experiences, while phasing out third-party cookies promises to reduce information overload in consent mechanisms, ultimately enhancing transparency.

2 Status Quo

Despite significant efforts and technological advancements, there are ongoing calls for the prohibition of personalized advertising, attempts to limit the use of personal data for digital ads to the point of de facto prohibition, and heated debates surrounding proven means of giving consent such as pay-or-okay models. It has come to the point that the Commission recently had to reaffirm that personalized advertising is not prohibited in the EU, underscoring legitimacy in the digital landscape. Courts also weighed in on this matter. The European Court of Justice thoroughly examined the legal framework of the GDPR concerning personalized advertising in July 2023 (C-252/21). In its ruling, it affirmed that pay-or-okay models constitute a valid means of obtaining consent under the GDPR. Similarly, the Austrian Court of Appeal (Oberster Gerichtshof Österreich – 6 Ob 56/21k, Rn. 107) addressed this issue in a 2021 case, asserting that such business models are neither immoral nor uncommon.

In general, the EU legislature has established various regulatory approaches regarding personalized advertising, explicitly rejecting a ban and acknowledging its positive impact on the EU economy. However, some regulators' increasingly stringent interpretations of what constitutes personal data and what requires consent remain to foster uncertainty in the digital economy and thereby pose a threat to the free and open internet. A key challenge lies in understanding the existing legal framework, built to balance data privacy and economic growth.

To address this issue, understanding the existing legal framework becomes imperative. Therefore, we would like to briefly list and categorize key legislation that shapes and regulates the handling of personal data, providing clarity for businesses and consumers:

1. **The EU Charter** requires that limitations on the fundamental freedom of conducting a business must be provided by law and be proportionate (Art 52(1)).
2. **The GDPR** sets conditions for lawful personal data collection and processing, with Recital 4 GDPR emphasizing the need for a balance between the fundamental rights at stake.
3. **The ePrivacy Directive / TTDSG** focuses on the protection of the privacy of end devices.
4. **The DSA** includes provisions such as the prohibition of personalized advertising for children, regulations on advertising based on specific characteristics, and requirements for transparency in online advertising.
5. **The DMA** mandates consent for data combination beyond specific »core« services (such as Ads) designated by the Commission.
6. **The Political Ads Regulation** requires consent for personalized political advertising, prohibits the use of particularly sensitive data, and establishes an online advertising archive. The proposal to impose less personalized options was discussed but ultimately abandoned due to its bias towards benefiting incumbent players with great financial resources targeting generalized audiences.

7. The Digital Content Directive 2019/770 and Consumer Rights Omnibus Directive 2019/2161 recognize an individuals' choice to either pay a fee or provide their personal data in return.
8. The Digital Governance Act explicitly acknowledges the possibility for data subjects to trade their personal data.

Despite common misconceptions, the fundamental problem isn't with relevant ads per se. People genuinely value personalized experiences that cater to their interests. The real challenge lies in the methods used to tailor ads; privacy regulators are wary of what they perceive as »pervasive« tracking across the internet. However, regulators often fail to distinguish adequately between various methodologies and advertising systems, such as first-party data versus third-party data, which enable audience targeting. Nonetheless, the primary goal is to strike a balance that honors user privacy while still providing personalized and pertinent content.

The latest technological advancements are tackling a persistent issue that has spanned three decades, preserving the progress made during this time while emphasizing user transparency and control over privacy. In parallel, the advertising industry is experiencing a significant shift, with major players discontinuing the use of third-party cookies. This transformation is substantial and poses challenges for advertisers who have failed to establish trusted relationships with customers, hindering their ability to gather, retain, and analyze valuable first-party data. This two-pronged strategy plays a vital role in cultivating a more favorable internet environment, marked by user trust, government respect and support for businesses of all sizes, including non-profits.

A closer examination of the data-driven industry reveals significant efforts being made to protect data. By proactively innovating in privacy enhancing technologies, the industry protects individuals' online privacy and empowers businesses and developers with the resources needed to sustain the growth of successful digital ventures. The introduction of novel web standards, which provide advertisers and publishers with alternatives to current technologies, is a key aspect of this ongoing endeavor to foster the expansion of digital enterprises. Another notable example is the development of Data Clean Rooms (DCRs), which represent a balance between deriving valuable insights from data and safeguarding user privacy. DCRs facilitate the matching of different data sets without compromising confidentiality, enabling advertisers to combine their data with platform data in a neutral environment. This approach enhances campaign targeting and attribution while minimizing the amount of processed data, unlike previous methods that led to the accumulation of vast databases.

It is important for lawmakers and courts to recognize these industry efforts aimed at enhancing user privacy.

3 Alternative forms of online advertising

Today, publishers and service providers can employ both personalized and contextual advertising strategies on their websites to finance their services and deliver content to users at no cost. Personalized advertising analyzes users' past online activities, such as website visits or application usage, along with demographic data, to customize ads based on their interests. In contrast, contextual advertising adapts ads to the content being viewed by the user, such as the webpage or app context or search terms, without relying on individual user profiles. Instead, targeting in contextual advertising is driven by users' immediate interests, indicated by their current actions or search queries, as well as external factors such as holiday season or time of day.

Contextual advertising is an important component in digital advertising toolbox by helping reach target audiences and generating revenue for publishers and service providers to support their digital services. However, personalized advertising remains indispensable in the digital advertising landscape for effective targeting of relevant audiences at low cost, in particular for SMEs. In a scenario dominated by contextual advertising alone, few service and content providers with the most diverse web presence would have more opportunities for advertisers to target specific contexts. This could result in reduced revenue for smaller publishers, bloggers, video content creators, and developers relying on ads for funding, as advertisers may pay less due to limited reach and targeting options. Consequently, online content diversity may decrease, and smaller or niche publishers may face financial challenges. Unlike personalized advertising, contextual advertising lacks features like reach optimization, limiting its effectiveness in certain aspects. Personalized advertising not only enhances revenue streams for advertisers, publishers and service providers but also meets the growing expectations of today's generations. ↗ Research by Salesforce revealed that 67 percent of millennials and Gen Z expect offers to always be personalized, driving sales in an age range with spending power topping \$2.5 trillion in 2020 according to ↗ YPulse. Given rising privacy concerns, contextual advertising retains significance in the digital advertising landscape. Yet, it cannot fully address both privacy concerns and business needs. An effective ban on personalized advertising and a transition to solely contextual advertising, would unfairly burden small publishers and news agencies. In addition, it would limit the ability of business and particularly SME to deploy targeted cost-efficient ads strategies and therefore also impact their ability to growth and enter new markets.

Beyond the competitive influences, imposing restrictions or conditions that are impossible to satisfy and would effectively lead to a ban of personalized advertising, could result in significant losses for all parties involved. Independent publishers and companies relying on open web technologies could lose \$32 to \$39 billion in annual revenue by 2025, according to a study published in February 2020 by Harvard Business School professor John Deighton. Research by Johnson et al. also indicates that publishers experience a 52 percent reduction in revenue from users who opt out of personalized online advertising. Similarly, advertisers relying on personalized advertisements face the risk of cuts, with attributed sales induced by advertising accounting for approximately half of the total gross merchandise value according to our members.

The solution is not to ban personalized advertising which fuels growth, diversity and quality of content. Millennials and Gen Zers expect and prefer personalized advertisements and consumer experiences. Moving to contextual-only ads will disproportionately hurt small publishers and news outlets. Both types of advertising are needed.

4 Considering the current debate

The ongoing debate surrounding the potential ban on personalized advertising, the general use of data in advertising and very strict consent requirements is often emotionally and ideologically charged. Some actors in this debate engage with unclear and opaque motives behind the introduced distinctions as seen in the two articles below:

- ↗ No, Contextual Advertising Is Not a Substitute for Targeted Advertising
- ↗ The Political and Corporate Interests Behind the Push to Ban Targeted Ads

To gain an objective understanding, it is crucial to recognize that personalized advertising is a legitimate business model facing increasing pressure in recent years. Despite regulatory initiatives and advancements in data protection, the market continues to innovate, with efforts aimed at enhancing data protection. In any event, a ban would come with great risks and, therefore, discussions on this topic are pertinent and warrant careful consideration.

A major part of the debate surrounding personalized advertising is currently centered on the so-called pay-or-okay models. These models have garnered significant attention because data protection authorities have raised concerns about their legal implications, despite the above-mentioned approvals by courts and law makers. Additionally, the EU Commission has initiated efforts regarding personalized advertising models, consent fatigue and media freedom through proposals such as the Cookie Pledge Initiative.

Pay-or-okay models

In pay-or-okay models, users are presented with the choice to either consent to their data being processed for the purposes of personalized advertising or opt for a tracking- and /or ad-free subscription. Across the various forms and approaches used by service providers, all pay-or-okay models share a common feature: they put the decision on financing back in the hands of the user, thereby strengthening informational self-determination. Pay-or-okay models have proven successful across numerous industries, including publishing, entertainment, and music. The connection between data processing and pay-or-okay models is well-established. In fact, EU legislators have officially recognized these »pay-or-okay« models as fundamentally legitimate and legal under the Digital Content Directive 2019/770. Article 3(1) of this Directive offers consumers the choice to pay either with money or with their personal data.

In addition to various data protection supervisory authorities, for example in Germany and France, the European Court of Justice (ECJ) recently considered a paid subscription to be an appropriate alternative to consent for personalized advertising. The ECJ emphasized that »those users must be free to refuse individually, in the context of the contractual process, to give their consent to particular data processing operations not necessary for the performance of the contract, without

being obliged to refrain entirely from using the service offered by the online social network operator, which means that those users are to be offered, if necessary for an appropriate fee, an equivalent alternative not accompanied by such data processing operations.« (paragraph 150, Case C-252/21). It is significant to note that the ECJ recognizes pay-or-okay models as a viable solution, even for dominant companies that operate sophisticated advertising systems.

Provided that the subscription fee is appropriate, and an alternative service is offered, pay-or-okay models meet the requirements for regulatory approval while offering users a choice and ensuring that services can continue to be made available to all consumers in the EU. The same assessment criteria must apply to all providers of digital services or content. If pay-or-okay models were deemed legally unviable, it would severely hinder a company's business operations and its capacity to finance its services. Such a decision would impede the right of a business to conduct its operations and its freedom to choose a business model, with far-reaching consequences.

A blanket prohibition would contradict the EU legislature's policy decisions reflected in legislation such as the Digital Content Directive. Restricting this model could undermine the primary revenue stream for many news and media organizations, impacting the diversity and plurality of the media landscape. The financial sustainability of the media is a key concern addressed in the Commission's proposal for a European Media Freedom Act. The pay-or-okay model has become essential in compensating for the decline in traditional advertising revenue. Without it, most media outlets – especially smaller and local ones – would struggle to compete. These principles are fundamental to the EU treaties and are reinforced by initiatives like the European Democracy Action Plan, which advocates for free and fair elections supported by a diverse and financially viable media ecosystem.

Complexity in Cookie Compliance

The debate is further muddled by the intricate regulatory landscape concerning cookies, which complicates compliance efforts. The requirements of the GDPR, local interpretations of the ePrivacy Directive (ePD), existing and proposed guidance from the EDPB, regulations from EU Member States, and new regulations like the DMA, DSA, and DGA create a patchwork of legal obligations for businesses. Some of these requirements may even conflict with each other, adding to the complexity of regulatory compliance in this area.

A notable example is the EU Commission's Cookie Pledge initiative and the EDPB draft guidelines on Art. 5(3) of the ePD. The Cookie Pledge Initiative's obvious goal of reducing cookie consent fatigue could conflict with the EDPB draft guidelines on Art. 5(3) of the ePD that look to replace the legislation with an unduly and significant scope expansion of the consent requirements under Art. 5(3) of the ePD. Conversely, the proposed ePrivacy Regulation has broadened the list of exemptions from the requirement to obtain user consent for cookie use, for example cookies for audience measure-

ment, cookies necessary for security purposes or software updates, cookies that allow users to log in to secure areas of a website, use a shopping cart, or use electronic billing services. Most of these scenarios are deemed to fall under the consent exemption, such as those related to safety or security, if the ePD is not construed in an absolutist manner. The extended (and non-legislative) approach does not promote consumer privacy. Instead, the expanded approach discourages privacy-enhancing technologies by subjecting them to regulation. It also exacerbates consumer consent fatigue, as loading any web page, including web pages filled with non-personalized content, may require consent. And, more importantly, it expects to replace the legislators' work.

Additionally, initiatives at both national and EU level, like the »consent management system« proposed in the Cookie Pledge initiative, seek to empower customers to pre-set their cookie preferences. However, this approach may conflict with the GDPR's stipulation that consent must be »specific« and assumes complete standardization regarding cookies.

While the Cookie Pledge initiative aims to counteract, it would ultimately lead to an increase in the overall volume of information required for users, potentially exacerbating consent and cookie fatigue. In addition to the information mandated by the ePD and GDPR, organizations would be required to furnish details about their business models and, where applicable, information regarding alternative forms of advertising.

The more detailed the regulations and guidelines become, the less room for maneuver is left for companies and their business models. Through ever more detailed regulations, regulators are restricting entrepreneurial freedom and often ignore existing business models or special features of industries. Related research supported by the Commission appears to assume that customers do not want personalized experiences and are disproportionately influenced by dark patterns in this regard. However, extensive consumer research has shown that consumers are twice as likely to accept all cookies from brands with a good reputation. It is important to emphasize that consumers have different expectations and experiences when it comes to the perception of trust in companies. Additionally, business models vary greatly, which is reflected in how cookies and tracking technologies are used. Consequently, consumer preferences are highly dependent on the specific context which they are operating in.

As per the above, the pledging principles, as they stand, risk creating further legal uncertainty, undermine consumer experience and potentially harm media plurality and the economic benefits enabled by advertisements. A solution for the future can only be effective if it recognizes the diversity of business models and consumer preferences as well as the importance of choice, transparency, and the right of organizations to communicate directly with consumers. Crucially, a successful approach will need to be explicitly aligned with existing legal requirements. We encourage the European Commission to rethink the Cookie Pledge initiative while pursuing a collaborative approach with regulators and operators.

5

Balanced perspectives on personalized advertising

The ongoing discourse and recurring criticism often overlook the intensive examination of the risks of personalized advertising, which has already taken place in the context of various legislative procedures and regulatory measures. Sometimes, the entire advertising industry is unfairly criticized, even being associated with criminal activities unrelated to its core functions. For instance, online advertising has been wrongly portrayed as a threat to national security. This disregard for the comprehensive regulatory measures already in place does not contribute constructively to the debate and undermines legal certainty. Moreover, the lack of harmonization among legislative procedures and regulatory actions further compounds legal uncertainty surrounding personalized advertising. To foster innovation and ensure compliance with applicable law, businesses require a stable and coherent legal framework. This necessitates aligning legislative processes and regulatory actions pertaining to personalized advertising to mitigate legal risks.

Our research highlights two key points: First, advertising-funded business models are fundamental to maintaining a free and open internet. Second, regulators must operate within their jurisdiction and respect legal frameworks, including court decisions. The financing of free online access to services, content, and information by advertisers is one of the foundations of the internet as we know it and is supported by existing legislation and judicial rulings, notably those of the ECJ. Therefore, personalized advertising and ad-financed business models are not only legitimate, but also enable free access to a wide range of online services and content for everyone. Any new regulations should aim to preserve the ability of these models to provide free access to online services, content, and information for users, while ensuring a balance between privacy and consumer protection. It should also consider the rapid development of new technologies like PETs and should also enable a differentiated assessment of supervisory authorities. We call on the EU Commission to urgently address these issues in the next legislative period and to revise outdated directives such as the ePD as quickly as possible and adapt them to the new technological reality. Pay-or-okay models can offer an alternative for some companies, depending on their business nature and activities, allowing users to exercise their right to choose and align with EU regulations, thereby promoting informational self-determination.

In conclusion of the arguments above, any regulation aiming for a complete ban of personalized advertising or severely limiting the use personal data for digital ads to the point of de facto prohibition would result in several direct consequences:

- a. Such regulations would hinder many market participants, such as advertisers, service providers and publishers, from collecting personal data, crucial for effective targeting and personalization in advertising. Fair access to this data must be preserved for all market players to ensure a competitive and innovative digital advertising landscape.
- b. Small advertisers, lacking extensive resources or established products and services tailored to niche audiences, may be particularly disadvantaged as they often depend on personalized advertising to compete effectively in the market.

- c. The competitiveness of advertisers exclusively operating within the EU could diminish compared to their international counterparts. This is because advertising in the EU would become less efficient and more costly due to decreased targeting capabilities resulting from the proposed regulations.

The plethora of transparency and consent requirements stemming from various advertising regulations has led to a flood of information for consumers. This information overload, especially in the realm of personalized advertising, risks breeding indifference and disengagement with crucial data protection and consumer privacy matters. Moreover, the complexity of consent processes can leave consumers unsure of what they agree to, undermining the transparency goals.

Proposed measures and guidelines must acknowledge how their implementation would exacerbate information overload and strive to simplify the consent process rather than adding to existing complexity. Neglecting these considerations could deepen consumer apathy towards data protection, ultimately thwarting the transparency and informed consent objectives.

Currently, many companies are dedicating resources to enhancing the safety, transparency, and privacy-friendliness of personalized advertising, with technologies like PETs leading the charge. These innovations aim to measure the effectiveness of advertising campaigns in a privacy-enhancing manner, known as private lift measurement. To incentivize broader adoption, there could be measures to permit data collection and processing under necessary or legitimate interests outlined in the ePD and GDPR frameworks. This approach would interpret »anonymity« based on GDPR criteria, rather than strict absolutist standards that demand zero risk of identifiability and avoid inappropriately extensive interpretations of the joint controllership definition just to facilitate enforcement.

Bitkom represents more than 2,200 companies from the digital economy. They generate an annual turnover of 200 billion euros in Germany and employ more than 2 million people. Among the members are 1,000 small and medium-sized businesses, over 500 start-ups and almost all global players. These companies provide services in software, IT, telecommunications or the internet, produce hardware and consumer electronics, work in digital media, create content, operate platforms or are in other ways affiliated with the digital economy. 82 percent of the members' headquarters are in Germany, 8 percent in the rest of the EU and 7 percent in the US. 3 percent are from other regions of the world. Bitkom promotes and drives the digital transformation of the German economy and advocates for citizens to participate in and benefit from digitalisation. At the heart of Bitkom's concerns are ensuring a strong European digital policy and a fully integrated digital single market, as well as making Germany a key driver of digital change in Europe and the world.

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